

# EXHIBIT

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## Shelly Bloor

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**From:** Will Cochran  
**Sent:** Wednesday, February 26, 2020 4:53 PM  
**To:** Chris Williams  
**Subject:** FW: Depositions of the named Plaintiffs/Scheduling Order

**From:** Horton, Odell <ohorton@wyattfirm.com>  
**Sent:** Wednesday, January 22, 2020 11:53 AM  
**To:** Frank Watson <fwatson@watsonburns.com>  
**Cc:** MMcLaren <MMcLaren@blackmclaw.com>; Brice Timmons <btimmons@blackmclaw.com>; Will Cochran <wcochran@blackmclaw.com>; Will Routt <wroutt@watsonburns.com>; Bill Burns <bburns@watsonburns.com>; btrammell@bakerdonelson.com; Craddock, Bob <rcraddock@wyattfirm.com>; Horton, Odell <ohorton@wyattfirm.com>  
**Subject:** RE: Depositions of the named Plaintiffs/Scheduling Order

Frank:

We can't deposition Ed Raper next week. We are contacting Raper, Moore, Oldham and Hammons regarding availability. I will update you early next week, if not before.

### Odell Horton Jr.

Wyatt, Tarrant & Combs, LLP  
Direct: (901) 537-1082

**From:** Frank Watson <[fwatson@watsonburns.com](mailto:fwatson@watsonburns.com)>  
**Sent:** Wednesday, January 22, 2020 11:24 AM  
**To:** Horton, Odell <[ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)>  
**Cc:** Mike McLaren <[mmclaren@blackmclaw.com](mailto:mmclaren@blackmclaw.com)>; [btimmons@blackmclaw.com](mailto:btimmons@blackmclaw.com); Will Cochran <[wcochran@blackmclaw.com](mailto:wcochran@blackmclaw.com)>; Will Routt <[wroutt@watsonburns.com](mailto:wroutt@watsonburns.com)>; Bill Burns <[bburns@watsonburns.com](mailto:bburns@watsonburns.com)>; [btrammell@bakerdonelson.com](mailto:btrammell@bakerdonelson.com)  
**Subject:** Re: Depositions of the named Plaintiffs/Scheduling Order

Thats correct. Can we depose Raper any day next week, since we have those days marked off?

If not, when can we do Raper?

We would like to do Raper first, then the named plaintiffs, then Moore, Oldham, Hammons, Zigler and save the Rule 30(b)(6) for the last. By making the Rule 30(b)(6) the last Depo, we might be able to avoid the issues you seem to have with the topics without having bother Magistrate Pham.

Just let the plaintiffs' team know.

Frank L. Watson, III  
Watson Burns, PLLC  
253 Adams Avenue  
Memphis, Tennessee 38104  
Phone: (901) 529-7996

Fax: (901) 529-7998  
[www.watsonburns.com](http://www.watsonburns.com)

On Jan 22, 2020, at 11:02 AM, Horton, Odell <[ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)> wrote:

Frank:

I want to confirm the depositions of the named Plaintiffs scheduled for next week are cancelled.

I will send you comments regarding the proposed Scheduling Order later this week.

Thanks.

Odell

**Odell Horton Jr.**

Wyatt, Tarrant & Combs, LLP  
6070 Poplar Ave., Suite 300  
Memphis TN 38119-3907  
Direct: (901) 537-1082  
Fax: (901) 537-1010  
Email: [ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)

<image001.jpg>

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